

TSD File Inventory Index

Date: April 26, 2006

Initial: CMK/...

Facility Name: <u>Afton Chemical Inc. (Ethyl Petroleum Additives - On Field Site)</u>		
Facility Identification Number: <u>LD 055 871 370</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status		.1 Correspondence
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos
.1 Correspondence		.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report
		.5 RFI QAPP

Total - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1 Lab Data - Soil Sampling / Groundwater			

Note: Transmittal Letter to Be Included with Reports.

Comments: One field site



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RECORD CENTER

NOV 22 1995

REPLY TO THE ATTENTION OF:

November 14, 1995

ETHYL PETROLEUM ADDITIVES INC
ATTN EDWARD COX
501 MONSANTO AVE
SAUGET IL 62201

RE: US EPA ID Number ILD 055 871 370
Location: 501 MONSANTO AVE
SAUGET IL 62201

In response to your correspondence of OCTOBER 25, 1995, the following
information has been updated:

LOCATION OF INSTALLATION TO
INSTALLATION CONTACT TO
INSTALLATION LEGAL OWNER
ADDRESS

501 MONSANTO AVE
EDWARD COX

330 S FOURTH ST
PO BOX 2189
RICHMOND VA 23217
D022 D039 D040 P120

ADDITION OF WASTE CODE

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

DEC 06 1991

ETHYL PETROLEUM ADDITIVES INC
ATTN: PARKS, DONNA
MONSANTO AVE
SAUGET, IL 62201

RE: EPA ID #: ILD055871370

In response to your request of 103091 the following
information has been updated:

Generator status to

LARGE

MARKET OR BURN HAZARDOUS WASTE
FUEL/GEN MARKETING TO BURNER
F002 F003 F005

Addition of waste code

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

COPY



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

JUL 09 1991

COPY

ETHYL PETROLEUM
ATTN; DONNA PARKS
MONSANTO AVE
SAUGET IL 62201

RE: EPA ID #: ILD055871370

In response to your request of 6/4/91 the following
information has been updated:

Installation contact to
Addition of waste codes

DONNA PARKS
D005, D018, D002 & D000

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

ATTN: ADAMS D.E. MGR.
Ethyl Petroleum Additives Inc.
Monsanto Ave.
Sauget, IL 62201

1/18, 1990

RE: EPA ID #: ILD055871370

In response to your request of 1/89 the following information
has been updated:

Added: Hazardous code F002, U189, U151
MARKETOR Burn Hazardous Waste Fuel
Generator Marketing to BURNER

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File

SW

AUG 17 1988



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

D F ADAMS PLT MGR
ETHYL PETROLEUM ADDITIVES INC
MONSANTO AVE
SAUGEST IL 62201

RE: EPA ID #: ILD 055871370

In response to your request of AUG 11 1988 the following information
has been updated:

CONTACT: ADAMS, D F PLT MGR
ADDED WASTE CODES: U031
P120

If you have questions, please contact Sharon Kiddon at (312)886-6173.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arthur S. Kawatachi".

Arthur S. Kawatachi
Information Section
RCRA Program Management Branch

cc: State Agency
File ✓

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

RECEIVED
(For Official Use Only)
MAY 14 2002

PROGRAM MANAGEMENT BRANCH

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☒
B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number - REGION 5

IL0055871370

II. Name of Installation (Include company and specific site name)

ETHYL PETROLEUM ADDITIVES INC.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

501 MONSANTO AVENUE

Street (Continued)

City or Town

SAUGET

State

Zip Code

IL

62201

County Code

County Name

ST. CLAIR

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

SAME

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

COX

EDWARD

Job Title

Phone Number (Area Code and Number)

ENV. ADVISOR

618-583-1078

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing
☒

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

ETHYL CORPORATION

Street, P.O. Box, or Route Number

330 S. FOURTH STREET

City or Town

State

Zip Code

RICHMOND

VA

23217-2158

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

Date Changed

804-788-5000

P

P

Yes

No

X

Month

Day

Year

CA 5/14/02 updated

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

C. Used Oil Management Activities

1. Generator (See Instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
 2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
 4. Exempt Boiler and/or Industrial Furnace
☐ a. Smelting, Melting, and Refining Furnace Exemption
☐ b. Small Quantity On-Site Burner Exemption
☐ 5. Underground Injection Control

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility
 2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Processor
☐ b. Re-refiner
☐ 3. Off-Specification Used Oil Burner
 4. Used Oil Fuel Marketer
☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

- ☐ Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 F002	2 F003	3 F005	4 U189	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

1. Ignitable (D001) <input checked="" type="checkbox"/>	2. Corrosive (D002) <input checked="" type="checkbox"/>	3. Reactive (D003) <input checked="" type="checkbox"/>	4. Toxicity Characteristic <input checked="" type="checkbox"/>
(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))			
1 0005	2 0009	3 0021	4 0022

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1 0039	2 0040	3 0018	4	5	6
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X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature <i>Edward M. Cox</i>	Name and Official Title (Type or print) EDWARD M. COX / ENV. ADVISOR	Date Signed 5/10/02
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XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

OCT 25 1995

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

I L D 0 5 5 8 7 1 3 7 0

II. Name of Installation (Include company and specific site name)

E T H Y L P E T R O L E U M A D D I T I V E S I N C .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

S O I M O N S A N T O A V E N U E

Street (continued)

Address update

City or Town

S A U G E T

State

ZIP Code

I L

6 2 2 0 1 -

County Code

County Name

S T . C L A I R

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

C O X

(first)

E D W A R D

Job Title

E N V . A D V I S O R

Phone Number (area code and number)

6 1 8 - 5 8 3 - 1 0 7 8

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing☒☐

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

E T H Y L C O R P O R A T I O N

Street, P.O. Box, or Route Number

3 3 0 S O F O U R T H S T R E E T B O X 2 1 8 9

City or Town

R I C H M O N D

State

ZIP Code

V A

2 3 2 1 7 - 2 1 5 8

Phone Number (area code and number)

8 0 4 - 7 8 8 - 5 0 0 0

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)

Month

Day

Year

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OCT 18 1995

IEPA/NI PC

FOIA ENTRY NOV 02 1995

~~Deleted~~

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See instructions)
☒ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
Mode of Transportation
☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify
3. Treater, Storer, Disposer (at installation)
Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
☒ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Burner - indicate device(s) - Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
5. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner - indicate device(s) - Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☒ 3. Reactive (D003) ☒ 4. EP Toxic (D000) ☒

(List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))

0018 0022 0005 0039

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 F002	2 F003	3 F005	4 4189	5 A 0120	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

A 1 0040	2 0021	3 0009	4 0008	5	6
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X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature

Edward M. Cox

Name and Official Title (type or print)

EDWARD M. COX, ENV. ADVISOR

Date Signed

10/13/95

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

ID — For Official Use Only											
C										T/A C	
W										1	
IX. Description of Hazardous Wastes (continued from front)											
A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.											
1		2		3		4		5		6	
F002		F003		F005							
7		8		9		10		11		12	
B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.											
13		14		15		16		17		18	
19		20		21		22		23		24	
25		26		27		28		29		30	
C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.											
31		32		33		34		35		36	
37		38		39		40		41		42	
43		44		45		46		47		48	
D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.											
49		50		51		52		53		54	
E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)											
<input checked="" type="checkbox"/> 1. Ignitable (D001)		<input checked="" type="checkbox"/> 2. Corrosive (D002)		<input checked="" type="checkbox"/> 3. Reactive (D003)		<input checked="" type="checkbox"/> 4. Toxic (D000)					
X. Certification											
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.											
Signature <i>David F. Adams</i>				Name and Official Title (type or print) David F. Adams - Plant Mgr.				Date Signed 10/4/91			


EPA Form 8700-12 (Rev. 11-85) Reverse

BILLING CODE 6560-50-C

RECORDED

Appendix—Form—Notification of Hazardous Waste Activity
EPA Form 8700-12 (Revised 11/85)Form Approved OMB No. 2050-0028 Expires 9-30-88
GSA No. 0246 EPA 01

Please print or type with ELITE type 12 characters per inch in the unshaded areas only

 EPA Notification of Hazardous Waste Activity		United States Environmental Protection Agency Washington, DC 20460		Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).	
For Official Use Only					
Comments					
C SUB					
Installation's EPA ID Number			Approved	Date Received (yr. mo. day)	
C F ILD 055871370 T/A C 1				JUL 20 1991	
I. Name of Installation					
ETHYL PETROLEUM ADDITIVES INC					
II. Installation Mailing Address					
Street or P.O. Box					
C 3 MONSANTO AVE					
City or Town				State	ZIP Code
C 4 SAUGET				IL	62201
III. Location of Installation					
Street or Route Number					
C 5 SAME					
City or Town				State	ZIP Code
C 5					
IV. Installation Contact					
Name and Title (last, first, and job title)				Phone Number (area code and number)	
C 2 PARKS, DONNA ENV. ENGR.				618 583 1323	
V. Ownership					
A. Name of Installation's Legal Owner				B. Type of Ownership (enter code)	
C R ETHYL CORPORATION				P	
VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)					
A. Hazardous Waste Activity			B. Used Oil Fuel Activities		
<input checked="" type="checkbox"/> 1a. Generator <input type="checkbox"/> 1b. Less than 1,000 kg./mo. <input type="checkbox"/> 2. Transporter <input type="checkbox"/> 3. Treater/Storer/Disposer <input type="checkbox"/> 4. Underground Injection <input checked="" type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below) <input checked="" type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner			<input type="checkbox"/> 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below) <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner <input type="checkbox"/> 7. Specification Used Oil Fuel Marketer (Or On-Site Burner) who First Claims the Oil Meets the Specification.		
VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)					
<input type="checkbox"/> A. Utility Boiler		<input type="checkbox"/> B. Industrial Boiler		<input type="checkbox"/> C. Industrial Furnace	
VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))					
<input type="checkbox"/> A. Air <input type="checkbox"/> B. Rail <input type="checkbox"/> C. Highway <input type="checkbox"/> D. Water <input type="checkbox"/> E. Other (specify)					
IX. First or Subsequent Notification					
Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.					
<input type="checkbox"/> A. First Notification <input checked="" type="checkbox"/> B. Subsequent Notification (complete item C)			C. Installation's EPA ID Number		
			ILD 055871370		

ID — For Official Use Only											
C										T/A/C	
W										1	
IX. Description of Hazardous Wastes (continued from front)											
A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.											
1 F002		2 F003		3 F005		4		5		6	
7		8		9		10		11		12	
B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.											
13		14		15		16		17		18	
19		20		21		22		23		24	
25		26		27		28		29		30	
C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.											
31 U031		32 U151		33		34		35		36	
37		38		39		40		41		42	
43		44		45		46		47		48	
D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.											
49		50		51		52		53		54	
E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)											
<input checked="" type="checkbox"/> 1. Ignitable (D001)			<input checked="" type="checkbox"/> 2. Corrosive (D002)			<input checked="" type="checkbox"/> 3. Reactive (D003)			<input checked="" type="checkbox"/> 4. Toxic (D005) D018		
X. Certification											
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.											
Signature <i>David J. Adams</i>				Name and Official Title (type or print) Plant Manager				Date Signed 6/4/91			

EPA Form 8700-12 (Rev. 11-85) Reverse

RECEIVED

JUN 13 1991

IEPA-DLPC

[Editor's note]

Environment Reporter

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only.

United States Environmental Protection Agency
Washington, DC 20460**EPA Notification of Hazardous Waste Activity**

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

RECEIVED

NOV 20 1989

RECEIVED

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)C
F I L D 0 5 5 8 7 1 3 7 0 T/A C 1

I. Name of Installation

ETHYL PETROLEUM ADDITIVES INC.

II. Installation Mailing Address

Street or P.O. Box

C
3 MONSANTO AVE

City or Town

State

ZIP Code

C
4 SAUGET

IL 62201

III. Location of Installation

Street or Route Number

C
5 SAME

City or Town

State

ZIP Code

C
6 SAME

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2 D. F. ADAMS PLANT MGR 618 274 4000

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R ETHYL CORPORATION

P

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

☒ 1a. Generator ☐ 1b. Less than 1,000 kg./mo.☐ 2. Transporter☐ 3. Treater/Storer/Disposer☐ 4. Underground Injection☒ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)☒ a. Generator Marketing to Burner☐ b. Other Marketer☐ c. Burner☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)☐ a. Generator Marketing to Burner☐ b. Other Marketer☐ c. Burner
Specification Used Oil Fuel Marketer (Or On-Site Burner) Who First Claims the Oil Meets the Specification.RECEIVED
NOV 27 1989RECEIVED
NOV 14 1989RCRA-IMS
U.S. EPA REGION VRCRA-IMS
U.S. EPA, REGION V

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate boxes)

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

✓ I L D 0 5 5 8 7 1 3 7 0

ID — For Official Use Only											
C											
W											
										T/A	C
											1
IX. Description of Hazardous Wastes (continued from front)											
A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.											
1		2		3		4		5		6	
E002		E003									
7		8		9		10		11		12	
B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.											
13		14		15		16		17		18	
19		20		21		22		23		24	
25		26		27		28		29		30	
C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.											
31		32		33		34		35		36	
U009		U031		U154		D120		U189		U151	
37		38		39		40		41		42	
43		44		45		46		47		48	
D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.											
49		50		51		52		53		54	
E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)											
<input checked="" type="checkbox"/> 1. Ignitable (D001)		<input checked="" type="checkbox"/> 2. Corrosive (D002)		<input type="checkbox"/> 3. Reactive (D003)		<input checked="" type="checkbox"/> 4. Toxic (D000)					
X. Certification											
<i>I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.</i>											
Signature				Name and Official Title (type or print)				Date Signed			
David F. Adams				David F. Adams				11/10/87			

EPA Form 8700-12 (Rev. 11-85) Reverse

BILLING CODE 6550-50-C

Plant Manager

ID — For Official Use Only													
C												T/A	C
W													1

IX. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F003	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U019	32 ✓ U031	33 U154	34 ✓ P120	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable
(D001)


☒ 2. Corrosive
(T002)

☐ 3. Reactive
(D303)

☒ 4. Toxic
(D000)

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) Plant Manager	Date Signed 7/22/88
--	--	------------------------

EPA Form 8700-12 (Rev. 11-85) Reverse

BILLING CODE 6560-50-C

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE / 87-9363

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.	NAME: PRESS HARD WHEN FILLING IN NAME & ADDRESS. <u>ETHYL PETROLEUM ADDITIVES INC</u> STREET ADDRESS: <u>MONSANTO AVE</u> CITY, STATE, & ZIP CODE: <u>SAUGET IL 62201</u>
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	
III. LOCATION OF INSTALLATION	

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F I L D 0 5 5 8 7 1 3 7 0		

I. NAME OF INSTALLATION

ETHYL PETROLEUM ADDITIVES INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

MONSANTO AVE

CITY OR TOWN

SAUGET

ST.

ZIP CODE

IL 62201

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

SAME

CITY OR TOWN

SAME

ST.

ZIP CODE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

TAYLOR WD DIRECTOR OF OPERATIONS

PHONE NO. (area code & no.)

618-274-4000

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

ETHYL CORPORATION

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I L D 0 5 5 8 7 1 3 7 0

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 4. TOXIC
(P000)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

DATE SIGNED _____

6/9/87



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD055871370

REACKNOWLEDGEMENT

ETHYL PETROLEUM ADDITIVES INC
MONSANTO AVE
SAUGET

IL 62201

INSTALLATION ADDRESS

MONSANTO AVE
SAUGET

IL 62201

11/19/84

m 11/19/84

W

13 1

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

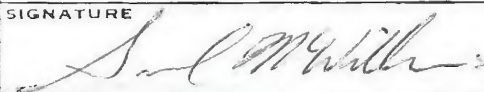
☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

SITE MANAGER

DATE SIGNED

10/15/84



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD055871370

REACKNOWLEDGEMENT

COOPER EDWIN INC
MONSANTO AVE
EAST ST LOUIS

IL 62201

INSTALLATION ADDRESS

MONSANTO AVE
EAST ST LOUIS

IL 62201



000187 AUG 18 80

FOR OFFICIAL USE ONLY

COMMENTS

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

CITY OR TOWN															ST.		ZIP CODE		
--------------	--	--	--	--	--	--	--	--	--	--	--	--	--	--	-----	--	----------	--	--

LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

C																				
5																				
15	16															45				
CITY OR TOWN																ST.	ZIP CODE			
C																				
6																				
15	16															40	41	42	43	-

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

[illegible]

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8	E	T	H	Y	L	C	O	R	P	O	R	A	T	I	O	N
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter “X” in the appropriate box(es))

☐ ^{CA} A. AIR ☐ ^{CB} B. RAIL ☐ ^{CC} C. HIGHWAY ☐ ^{CD} D. WATER ☐ ^{CE} E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ **B. SUBSEQUENT NOTIFICATION** (complete item C)

C. INSTALLATION'S EPA I.D. NO.

1	L	D	0	5	5	8	7	1	3	7	0
---	---	---	---	---	---	---	---	---	---	---	---

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 15 1980

W 1LD05587137021

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)☒ 1. IGNITABLE
(D001)☐ 2. CORROSIVE
(D002)☐ 3. REACTIVE
(D003)*** ☒ 4. TOXIC
(D000)**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

B W Corlew

NAME & OFFICIAL TITLE (type or print)

B. W. Corlew
Director of Manufacturing

DATE SIGNED

8/6/80

EPA Form 8700-12 (6-80) REVERSE

*** The toxic characteristic is tentative pending results of laboratory analysis.



Ethyl Petroleum Additives, Inc.
501 Monsanto Avenue
Sauget, Illinois 62201
TEL: 618-583-1000

May 10, 2002

U.S. EPA Region 5
RCRA Activities
77 West Jackson Boulevard
P.O. Box A3587
Chicago, IL 60690

RECEIVED
MAY 14 2002

PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5

**RE: RCRA Notification of Regulated Waste Activity
Subsequent Notification**

Dear Sir or Madam:

Please find enclosed a subsequent Notification of Regulated Waste Activity form (EPA Form 8700-12). This notification updates and supercedes the previous notification submitted October 13, 1995. This notification *removes* F-listed code P120, as this waste is not generated by this facility.

If you have any questions, please contact me at (618) 583-1078.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward M. Cox", is written over a light-colored background.

Edward M. Cox
Environmental Advisor

Cc: Illinois Environmental Protection Agency
Division of Land Pollution Control
1021 N. Grand Avenue E.
Springfield, IL 62794

Encls.

C.2



EMBASSY SUITES
HOTELS®

DERRICK (REQUISITES)

- Unit 258 - RECESSES, LINDBASS & MENAPES BENZENE
- Unit 270 - uses barium hydroxide & formic acid
- Unit 275 - maleic anhydride in batch reactor
- Unit 290 - hydrazine is stored in unit 290 in storage tanks with secondary containment
- Unit 27 - maleic anhydride batch loaded into reactor
- Unit 200 - Isobutyl Alcohol - Storage Tanks



embassysuites.com 800-Embassy



Official Sponsor



Land and Chemicals Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action
☐ Return to Compliance
☐ Other Correspondence- NOD, memo to ORC

Facility Name: Afton Chemical Corporation

City: Sauget State: IL

U.S. EPA ID#: ILD 055 871 370

Assigned Staff: Sheila Burrus Phone: 6-3587

Name	Signature	Date
Author	<i>Sheila Burrus</i>	3/7/12
Regional Counsel	<i>See Attached email</i>	3/7/12
Section Chief	<i>Laura M. Jorg</i>	3/7/12
Branch Chief	<i>Jay Victorine</i>	3/12/12

AC
3/12

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

Once the certified mail receipt is returned:

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.



Re: Afton Chemical NEIC/Region 5 multimedia Inspection 
Susan Perdomo to: Sheila Burrus

03/07/2012 02:59 PM

From: Susan Perdomo/R5/USEPA/US
To: Sheila Burrus/R5/USEPA/US@EPA

Sheila - I've been on annual leave since 10:30 today, that's why I asked you to call me at 8:00.

I concur with the NOB, so please feel free to use this email as my sign-off on the NOV, but do not include the inspection report. Kathy confirmed this is alright. Thank you, Susan

-----Sheila Burrus/R5/USEPA/US@EPA wrote: -----

=====
To: Susan Perdomo/R5/USEPA/US@EPA
From: Sheila Burrus/R5/USEPA/US@EPA
Date: 03/07/2012 01:40PM
Subject: Re: Afton Chemical NEIC/Region 5 multimedia Inspection
=====

Hi Susan,

I left you a message at appropriately 12:30 p.m. at your home. I will stay at my desk to await your returned phone call. I have no additional meetings today.
Thanks

Sheila



To: Illinois EPA
Cc: Sheila Burrus/R5/USEPA/US, Gary Victorine/R5/USEPA/US
Bcc:
Subject: Enforcement Action Communication- Afton Chemical Corporation (NOV)

This is to inform you that on or about March 9, 2012, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to Afton Chemical Corporation (Afton) located in Sauget, Illinois. The alleged RCRA violations were found during U.S. EPA and the National Enforcement Investigation Center's (NEIC) June 15-21, 2011 multi-media inspection of Afton.

Contact: Sheila Burrus, (312) 886-3587



AftonChemical.NOV.2.27.12.doc

Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division (LR-8J)
U.S. EPA, Region 5, Chicago
Telephone: (312) 353-5110
Facsimile: (312) 385-5519



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 16 2012

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL #7009 1680 0000 7667 1477
RETURN RECEIPT REQUESTED

Mr. Rick Williams
Health Safety Environmental and Security
Afton Chemical Corporation
501 Monsanto Avenue
Sauget, Illinois 62201

Re: Notice of Violation
Afton Chemical Corporation
U.S. EPA ID.: ILD 055 871 370

Dear Mr. Williams:

On June 15 through 21, 2010 representatives of the U.S. Environmental Protection Agency and the National Enforcement Investigations Center (NEIC) conducted a multi-media inspection at Afton Chemical Corporation (Afton), located in Sauget, Illinois. The purpose of the RCRA portion of the inspection was to evaluate Afton's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste.

Based on information provided by Afton personnel, review of records and personal observations made by NEIC and EPA inspector at the time of the inspection, EPA has determined that Afton is in violation of the following requirement of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR):

1. A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. See, 35 IAC § 722.133(d)(1) [40 CFR § 273.33(d)(1)].

At the time of the inspection, Afton Chemical was storing two 4-foot lamps against a wall and four u-tube lamps were lying out on the back of a small open trailer in the bulb crushing area. The lamps were confirmed to be crushed and contained by Edward Cox later that afternoon.

bcc: Susan Perdomo, ORC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 18 2004

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward M. Cox
Manager-Health, Safety, Environmental & Security
Afton Chemical
501 Monsanto Ave.
Sauget, Illinois 62201

Re: Compliance Evaluation Inspection
EPA I.D. No.: ILD 055 871 370

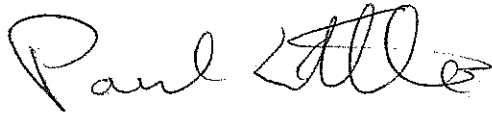
Dear Mr. Cox:

On September 17, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Afton Chemical located in Sauget, Illinois (the facility). The purpose of the inspection was to evaluate Afton's compliance with certain conditions and requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those conditions related to the Standards Applicable to Generators of Hazardous Waste, Standards for Land Disposal restrictions, and Management of Used Oil set forth at 35 Illinois Administrative Code (IAC), Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, and Title 40 of Code of Federal Regulations (40 CFR) Parts 262, 265, 268, and 279 respectively. Enclosed please find a copy of our inspection report.

As of this writing, based upon information available to U.S. EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes.

If you have any questions or concerns regarding this matter, please contact Derrick Samaranski of my staff at, 312-886-7812.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Little". The signature is written in dark ink on a white background.

Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Todd Marvel, Illinois EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: Afton Chemical (Ethyl Petroleum Additives)
EPA I.D. No.: ILD 055 871 370

FACILITY ADDRESS: 501 Monsanto Ave.
Sauget, IL 62201

**FACILITY TYPE/
PRIORITY SECTOR:** Petrochemical Manufacturing, Chemical Additives

RCRA DESIGNATION: Large Quantity Generator

NAICS CODE: 32511

DATE OF INSPECTION: September 17, 2004

**FACILITY
REPRESENTATIVES:** Edward M. Cox, Manager-Health, Safety,
Environmental & Security

Dale H. Lyons, Senior Environmental Specialist

Donna Parks Ratkowski, P.E., Senior
Environmental Specialist

U.S.EPA INSPECTOR: Derrick Samaranski, WPTD, ECAB, CS2

REPORT PREPARED BY: Derrick Samaranski, Environmental Engineer

REPORT REVIEWED BY: Paul Little, Chief
Compliance Section 2
WPTD, ECAB

Purpose of Inspection:

This inspection was conducted as a follow-up to the Compliance Evaluation Inspection (CEI) conducted at the facility on June 3, 2003.

Facility Description:

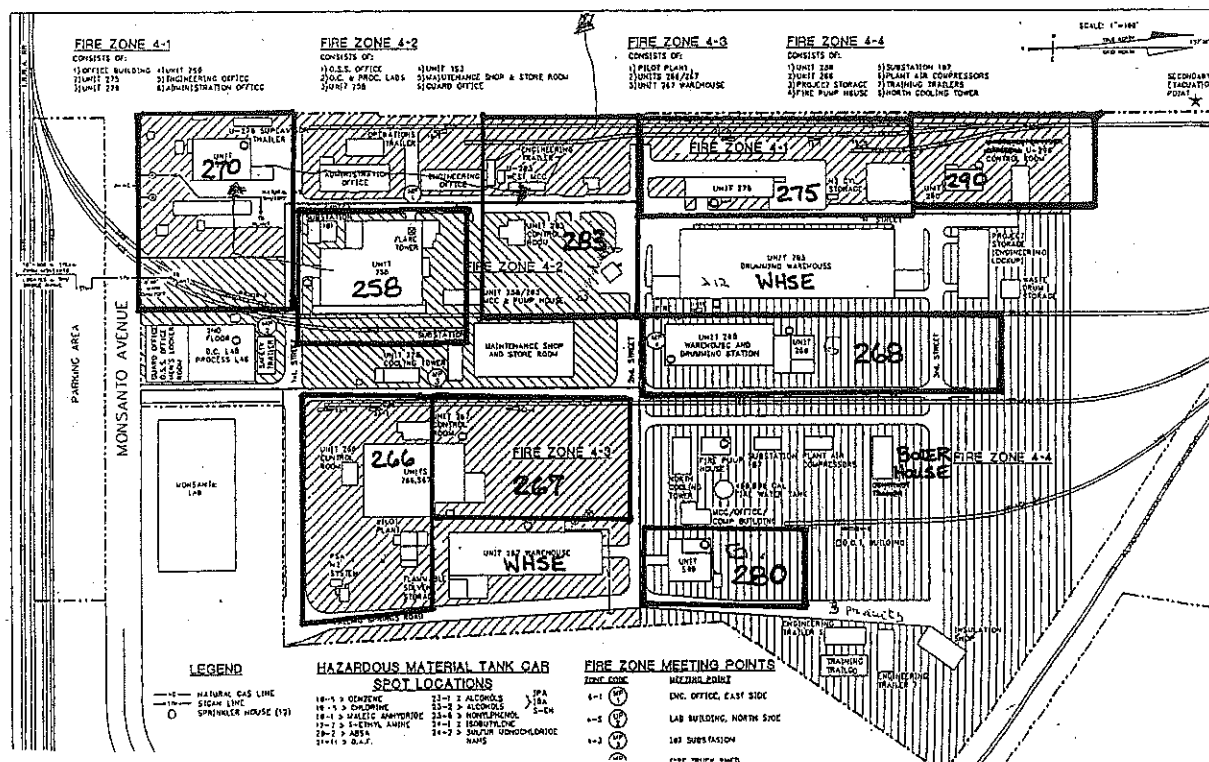
Afton Chemical, formerly Ethyl Petroleum Additives, is a manufacturer of fuel and lubricant additives. Afton produces various organic and synthetic additives for lubricating oils, fluids, and greases for a number of oil markets that include: automotive gear oils, anti-wear oils, metalworking fluids, industrial chemicals, and transmission fluids. The facility also produces fuel additives to enhance octane, reduce emissions, and increase lubricity of: gasolines, diesel, aviation, power generation, and heating fuels. The production and blending of various additive products at the facility is conducted in nine manufacturing units, some of which utilize materials that contain hazardous constituents listed in Appendix H of Section 721 in IAC. Units 258, 270, 275, 290, 267, and 266 either use raw materials containing hazardous constituents or generate final products that contain hazardous waste constituents. Afton identified eleven hazardous constituents that are used in its production processes and they are listed in Table 1.

Appendix H Constituents Used by Afton Chemical	EPA Waste Code	Raw Material	Final Product
Barium Compounds	D005	X	X
Benzene	U018	X	X
Carbon Disulfide	P022	X	
Ethylene Glycol Monoethyl Ether	U359	X	X
Formic Acid	U123	X	
Hydrazine	U133	X	
Hydrogen Sulfide	U135		X
Isobutyl Alcohol	U140	X	
Lead Trace Amounts	D008	X	X
Maleic Anhydride	U147	X	
Vandium Pentoxide	P120	X	

Table 1: Appendix H Constituents

Unit 258 uses benzene, which is delivered to the facility by a railcar every ten days and is unloaded to a 35,000 gallon storage tank located within a containment area. In addition, the unit reclaims and reuses any unreacted benzene from the three 3,000 gallon batch reactors operating in the unit. Forty million pounds per year of alkyl sulfonic acid (ABSA) intermediate is generated in unit 258 for use in other production units. The ABSA produced in unit 258 is utilized in unit 270 to produce sulfonated products. In

addition to ABSA other feed materials to Unit 270 include barium hydroxide and formic acid. The formic acid is stored in 6,000 gallon storage tank and barium hydroxide is stored in sacks. Units 267 and 275 both utilize maleic anhydride which is batch fed to the reactors. Unit 267 produces gear blends and unit 275 produces polyester copolymer PBSA (polybutylene succinate adipate). Hydrazine, carbon disulfide, and hydrogen sulfide are utilized and stored in unit 290. Isobutyl alcohol is stored in storage tanks in unit 266 and used in reactor vessels in the unit. All the production units are shown on the facility diagram:



hazardous constituents listed in Appendix H of Section 721 in IAC, to determine which production areas to visit. Only those production units identified as managing materials with hazardous constituents were visited.

Mr. Parks Ratkowski described each manufacturing unit of the facility in terms of raw materials, process units, and final products generated by each unit. Based on the description of the manufacturing units and the list of the hazardous constituents obtained by Mr. Cox from the facility's research personnel, six units were identified as managing materials with hazardous constituents. Mr. Lyons provided information on the past spills or releases from each production unit. Afton had a spill of formic acid in unit 270 that occurred during transfer to the storage tank and as a result 25 gallons of material were released. After the facility walkthrough Mr. Lyons showed me the facility's operating record describing the release and action taken to manage it. The material was managed as hazardous waste in the facility's waste water management unit.

The walkthrough portion of the facility inspection began at 1:15pm, after the lunch break. Accompanied by Mr. Cox and Mr. Lyons we first visited unit 258 where the facility receives, unloads and manages benzene. We followed the benzene piping from the unloading area to the storage tank to the process units that utilize and reclaim benzene. No benzene spills or leaks were noted along the process lines, storage tank, and process units. In the benzene/product transfer area I observed dark staining on the gravel underneath the product fill pipe (see picture 1). Mr. Cox explained that the spill has resulted from the transfer of HiTec 614/615 product to a rail tanker car, and that the HiTec 614/615 product neither contained hazardous waste constituents nor would be considered a hazardous waste when spilled or released. Next we visited unit 270. Afton stores and uses barium hydroxide and formic acid in unit 270. At the time of my visit the facility had no barium hydroxide on site and was storing formic acid in a 6,000 gal storage tank. Barium hydroxide is batch fed to the process units. On September 13, 2004 Afton had a release of formic acid during a transfer operation to the storage tank. The released material was rinsed into the facility's waste water management drain and treated in the waste water treatment plant (see picture 2).

Unit 275 utilizes maleic anhydride in batch reactors, and at the time of my visit I observed no visible releases of maleic anhydride around the reactors. Hydrazine is stored in unit 290 in a storage tank that is equipped with a secondary containment filled with water to prevent ignition of the released material. There were no spills or leaks of hydrazine along the piping leading from the storage tank to the process units. However, I observed discoloration of gravel in unit 290 along the rail tracks. Mr. Cox explained that the facility had an oil release from a rail tanker car when the transfer house burst. The release took place approximately three months prior to my visit. Following the inspection of the unit we next visited unit 267, which like unit 275 uses maleic anhydride in its production process. Maleic anhydride is batch loaded into the reactors. No observable releases were noted in the process or maleic anhydride receiving area. The facility walkthrough ended with the inspection of the unit 266 isobutyl alcohol storage tanks, process units and piping used to convey the material to the reactors. No spills or releases were noted in unit 266. The inspection ended with a short closing conference.

Attachments:

1. Inspection Photo Log.

**Afton Chemical
ILD 055 871 370**



Date: September 17, 2004

Time: 1:34 PM

Photographed By: Derrick Samaranski

Photograph Number: 1

Photograph File Name: P1010001

Comments: Product Spill in Unit 258.

Afton Chemical
ILD 055 871 370



Date: September 17, 2004

Time: 1:53 PM

Photographed By: Derrick Samaranski

Photograph Number: 2

Photograph File Name: P1010004

Comments: Formic Acid spill area in Unit 270.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

DATE: September 19, 2003

FACILITY NAME: Ethyl Petroleum Additives
ILD 055 871 370

FACILITY ADDRESS: 501 Monsanto Ave.
Sauget, IL 62201

FACILITY CONTACT: Paul Griffin
Environmental Compliance Manager
618-583-1000

FACILITY TYPE/
PRIORITY SECTOR: Chemical additives for use in petroleum lubricants.

PBTs: Not Applicable

REGULATORY
REPRESENTATIVES: Bryan Holtrop, U.S. EPA - Region 5

DATE OF INSPECTION: June 3, 2003

NAIC CODE: 325998

REPORT PREPARED BY: Bryan Holtrop

REPORT REVIEWED BY: Bryan Holtrop

Purpose of Inspection:

The purpose of the inspection was to conduct a compliance evaluation inspection of the facility to determine its compliance with all applicable RCRA requirements for large quantity generators. Prior to the inspection, I reviewed the facility's files maintained in EPA Region 5 and EPA's RCRAinfo database.

Plant Description

The facility manufactures chemical additives through a series of chemical processes that are used in the production of motor oils. The production process is performed in piping and tanks systems located outdoors.

On-site Observations

I toured the facility site. The tour generally followed the production process and

hazardous waste management process. RCRA records were all kept on-site and were readily available. Containers of hazardous waste were being stored outdoors in two different locations. One behind the laboratory building and the other in an area centrally located on the site. Evidence of spills (pools of free liquid) or releases (soil and ground stains) from the production process were observed.

General Management for Generators

There were several containers of hazardous waste stored on-site at the time of the inspection. Also the facility operated a wastewater treatment facility where the wastewater treatment sludge was managed as a hazardous waste.

Manifests

I conducted a review of the manifest records for the last 3 years. No deficiencies were observed.

Preparedness and Prevention

I reviewed the facility's contingency plan. No deficiencies were observed.

Training Records

I reviewed the facility's training records and program and no deficiencies were found.

Waste Evaluation

The facility generates hazardous wastes from its laboratory operations waste water treatment process and its production processes. No deficiencies were observed regarding the applicable RCRA requirements for waste evaluation.

Pre-Transport

All containers of hazardous waste were closed and labeled as hazardous waste with the dates of accumulations. No deficiencies were observed.

Storage Requirements

At the time of the inspection, the facility was storing several containers of hazardous waste in its central storage area. All the containers observed had been stored for less than 90 days. Containers were inspected weekly. No deficiencies were observed.

Satellite Accumulation

The facility had satellite accumulation areas in the laboratory area and waste water treatment area. No deficiencies were observed.

Tanks

The facility has no hazardous waste storage tanks and none were observed during the inspection.

Comments

It appeared there were leaks and staining of ground and paved areas around some of the production process areas which are all outdoors. Information should be requested from the facility to determine what processes contain hazardous waste constituents and whether there have/are any releases or possibility of releases of such constituents from the facility's production processes.

UNITED STATES POSTAL SERVICE

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• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Derrick Samaranski DE-9J

95041365

95041365



Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☒ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request

Facility Name : ARTON CHEMICAL (ETHYL PETROLEUM ADDITIVES)

Facility Location: 501 MONSANTO

City: SAUGET State: ILLINOIS

U.S. EPA ID# ILD 0558 71370

Assigned Staff DERRICK SAMARANYKI Phone: 312-886-7812

Name	Signature	Date
Author	<i>Derrick Samaranyki</i>	10/14/04
Regional Counsel		
Section Chief	<i>R</i>	10/15/04

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

NOTIFICATION OF TREATMENT FOR CHARACTERISTIC HAZARDOUS WASTE
SUBMITTED IN ACCORDANCE WITH 40 CFR 268.9

RECEIVED

JUL 20 1995

GEORGE HAMPER
CHIEF, ILLINOIS SECTION
E.P.A. REGION V
77 WEST JACKSON BLVD., MAIL CODE HRP 8J
CHICAGO, ILLINOIS 60604

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

This notification of treatment of characteristic hazardous waste is submitted in accordance with the notification requirements of 40 CFR 268.7 (FR 55, No. 106, P. 22531, June 1, 1990).

Generator: Ethyl Petroleum Additives
Address: 501 Monsanto Ave
SAUGEY, ILL
Contact: Bill Williams
Phone: 618-583-1054
EPA I.D. #: ILL 055871370

The above named facility has contracted with Perma-Fix Sludge Treatment Systems, Inc. to provide on-site treatment of characteristic hazardous wastes in accordance with the provisions of 40 CFR 262.34, 268.7, 268.9. This waste is not a listed waste and will be treated within the generator's 90 day accumulation period.

Waste Stream Name: Stabilized gravel

Process Generating Waste: powdered meter containing Lead & Cadmium compounds were blown over fence during storm and fell on gravel. This gravel was treated by Perma-Fix and rendered non haz.

Container Type: Roll off boxes

(X) One-Time estimated volume: 40-45 yds.
() On-Going generation: _____

Characteristic waste code(s): D006 D008

Treatment Use: () Neutralization
() Cyanide destruction
(X) Stabilization
(X) Solidification
() Other

WASTE ANALYSIS PLAN FOR TREATED CHARACTERISTIC
HAZARDOUS WASTE SUBMITTED IN ACCORDANCE WITH
40 CFR 267.8 (FR 55, NO. 106, P. 22670, JUNE 1, 1990)

Waste Name: Stabilized gravel

Generator: Ethyl Petroleum Additives

Analysis on a representative sample of untreated waste:

Generator knowledge states that
it contained Cadmium + Lead.

Testing on treated sample of waste:

See Attached

Analysis of treated waste:

Waste Code Untreated Waste:

D006
D008

Treatment Limits:

1 ppm
5 ppm

Certification: Random samples of treated waste will be tested before it is shipped to a subtitle D landfill.

I certify under penalty of law, that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Generator: Ethyl Petroleum Additives Phone: 618 583-1054

Contractor Tech. Contact: Jay Taylor
Perma-Fix, Inc.
1525 N. 105 E. Avenue
Tulsa, Oklahoma 74116-1515
(918) 836-0700

Subtitle D facility that will receive the waste:

Waste Mgmt Milam
601 Madison Rd.
E St Louis IL 62201

This waste will be treated and sampled in accordance with the attached sample plan.

Authorized Generator Signature: X Bill Williams

Printed Name: Bill Williams

Title: Div. Mgr.

Date: X 7-11-95

Attachments:

1. Waste analysis plan
2. Laboratory analysis of untreated waste
3. Analysis of treated waste (Perma-Fix conducted pilot study)

Contractor technical contact:

Jay Taylor
Perma-Fix, Inc.
1525 N. 105 E. Avenue
Tulsa, Oklahoma 74116-1515

Telephone # 918-836-0700

SHERRY LABORATORIES

INDIANA LOUISIANA OKLAHOMA

Metlab Testing Services, Inc

10635 E. Independence, Suite 102 • Tulsa, Oklahoma 74116-5673
918-234-7111 • 800-324-6767 • Fax 918-234-7152

Environmental Division



PERMA-FIX

MLTS# 95-6775

SAM# 95-05-484

ATTN: MENDELL CLARK

DATE RECEIVED: 06/13/95

CONTACT GEORGE

COLLECTED BY: NOT SPECIFIED

DATE COLLECTED: 06/12/95

PO# TUL 50076

In accordance with your instructions, chemical analysis was performed on a sample submitted from your company on the above date. The results of the analysis are listed below.

SAMPLE ID	PARAMETER	RESULTS	UNITS	ANALYST	ANALYZED	METHOD
STABLE CONTAMINATED SOIL	ASL CONTENT	96.5	%	BWL	06/16/95	ASTM D-3174
	CALCIUM CARBONATE	12.1	%	TWH	06/27/95	UNSPECIFIED
	CYANIDE, TOTAL	0.1	mg/kg	LIN	06/23/95	SW846 9012
	FLASHPOINT CLOSED-CUP	>200	deg F	TWH	06/27/95	ASTM D-93
	PERCENT SOLIDS	81.8	%	BWL	06/15/95	ASTM 2216-92
	PHENOL	0.625	mg/kg	LIN	06/26/95	SW846-9066
	PH (50% Aqueous Extract)	10.0	std.	BWL	06/15/95	SW846-9040
	PAINT FILTER TEST	PASS	P/F	ECL	06/19/95	SW846-9095
	SULFIDES, REACTIVITY	11	mg/kg	TWH	06/16/95	UNSPECIFIED
	TOTAL SOLIDS	818000	mg/kg	BWL	06/15/95	EPA 160.3
	WATER MIX	*NR	E/NR	LIN	06/27/95	UNSPECIFIED

Should you have any questions, please feel free to call.

TUL 50076 ETHYL PETROLEUM STABILIZED CONTAMINATED SOIL/GRAVEL
*NR NON-REACTIVE

Approved by:

George A. Oust
Vice President

Dated: 06/27/95

SHERRY LABORATORIES

INDIANA LOUISIANA OKLAHOMA

Melab Testing Services, Inc.

10836 E. Independence, Suite 102 • Tulsa, Oklahoma 74116-6873
918-234-7111 • 800-324-6767 • Fax 918-234-7152

Environmental Division



PERMA-FIX

MLTS# 95-5775

SAM# 9506484-01A

ATTN: WENDELL CLARK

DATE RECEIVED: 06/13/95

CONTACT GEORGE

COLLECTED BY: NOT SPECIFIED

DATE COLLECTED: 06/12/95

10 STABLE CONTAMINATED SOIL

PCB'S BY EPA METHOD 8080

PARAMETER RESULT

AROCIOR-1016	ND
AROCIOR-1221	ND
AROCIOR-1232	ND
AROCIOR-1242	ND
AROCIOR-1248	ND
AROCIOR-1254	ND
AROCIOR-1260	ND

SURROGATE % RECOVERY NA

Notes and Definitions:

Sampling Information:

ANALYST KAR
UNITS mg/kg
MATRIX SOIL
INSTRUMENT GC
EXTRACTED 06/13/95
ANALYZED 06/16/95

COMMENTS: SURROGATE DILUTED OUT.

This sample has a detection limit of 1.00

QA/QC RESULTS

PARAMETER	DUPA	DUPB	SPIKE % RECOVERY
AROCIOR-1254	1.09	1.12	109

Results obtained from a sample in the same batch.

Approved by:

George A. Dust
Vice President

Dated: 06/27/95

SHERRY LABORATORIES
INDIANA LOUISIANA OKLAHOMA
Metlab Testing Services, Inc.

10835 E. Independence, Suite 102 • Tulsa, Oklahoma 74116-5673
918-234-7111 • 800-324-6757 • Fax 918-234-7152

Environmental Division



PERMA-FIX _____ MLTS# 95-5775 _____ SAN# 9506484-01A _____
ATTN: WENDELL CLARK _____ DATE RECEIVED: 06/13/95 _____ CONTACT: GEORGE _____
COLLECTED BY: NOT SPECIFIED _____ DATE COLLECTED: 06/12/95 _____ ID STABLE CONTAMINATED SOIL _____

TCLP METALS RESULTS

PARAMETER	RESULT	ANALYST	ANALYZED	MCL (mg/l)	METHOD
ARSENIC	<0.50	JLV	06/22/95	5.00	SW846-6010
BARIUM	0.25	DAH	06/27/95	100.00	SW846-6010
CADMIUM	0.02	DAH	06/27/95	1.00	SW846-6010
CHROMIUM	<0.01	DAH	06/27/95	5.00	SW846-6010
LEAD	<0.10	DAH	06/27/95	5.00	SW846-6010
MERCURY	<0.0001	DM	06/15/95	0.20	SW846-7470
SELENIUM	<0.50	DAH	06/27/95	1.00	SW846-6010
SILVER	<0.01	DAH	06/27/95	5.00	SW846-6010

MCL: Maximum Concentration Limit

Results in mg/l in the EXTRACT

DATE EXTRACTED 06/14/95

COMMENTS: INITIAL pH-9.86

Should you have any questions, please feel free to call.

Approved by: _____ Dated: 06/27/95
George A. Dust
Vice President

SHERRY LABORATORIES

INDIANA LOUISIANA OKLAHOMA

MetLab Testing Services, Inc

10835 E. Independence, Suite 102 • Tulsa, Oklahoma 74116-5673
918-234-7111 • 800-324-5757 • Fax 918-234-7152

Environmental Division



PERMA-FIX

MLTS# 95-5775

SAM# 9506484-01A

ATTN: HENDALL CLARK

DATE RECEIVED: 06/13/95

CONTACT GEORGE

COLLECTED BY: NOT SPECIFIED

DATE COLLECTED: 06/12/95

ID STABLE CONTAMINATED SOIL

TCIP VOLATILE COMPOUNDS EPA METHOD 8260

PARAMETER	RESULT	RCRA LIMIT (ppm)
BENZENE	ND	0.50
CARBON TETRACHLORIDE	ND	0.50
CHLOROBENZENE	ND	100.0
CHLOROFORM	ND	6.0
1,2-DICHLOROETHANE	ND	0.50
1,1-DICHLOROETHENE	ND	0.70
METHYL ETHYL KETONE	ND*	200.0
TETRACHLOROETHENE	ND	0.7
TRICHLOROETHENE	ND	0.5
VINYL CHLORIDE	ND*	0.20

SURROGATE %RECOVERY NOTES:

DI-BROMOFLUOROMETHANE	95	ANALYST DSP
TOLUENE-D8	99	UNITS PPM
BROMOFLUOROBENZENE	100	ANALYZED 06/15/95

DETECTION LIMITS:

NO - NOT DETECTED AT DETECTION LIMIT 0.02
ND* - NOT DETECTED AT DETECTION LIMIT 0.05

QA/QC RESULTS

PARAMETER	DUPA	DUPB	SPIKE % RECOVERY
1,1-DICHLOROETHENE	91	94	94
TRICHLOROETHENE	92	100	100
BENZENE	104	110	110
CHLOROBENZENE	91	93	93

Results obtained from a sample in the same batch.

COMMENTS:

Approved by:

George A. Dust
Vice President

Dated: 06/27/95

SHERRY LABORATORIES
INDIANA LOUISIANA OKLAHOMA

MettLab Testing Services, Inc.

10835 E. Independence, Suite 102 • Tulsa, Oklahoma 74116-6673
918-234-7111 • 800-324-5767 • Fax 918-234-7152

Environmental Division



PERMA-FIX

MLTS# 95-5775

SAM# 9506484-01A

ATTN: WENDELL CLARK

DATE RECEIVED: 06/13/95

CONTACT GEORGE

COLLECTED BY: NOT SPECIFIED

DATE COLLECTED: 06/12/95

ID STABLE CONTAMINATED SOIL

TCIP SEMIVOLATILE COMPOUNDS
EPA METHOD 8270

PARAMETER RESULT RCRA LIMIT (ppm)

M & P-CRESOL	ND	200.0
O-CRESOL	ND	200.0
1,4-DICHLOROBENZENE	ND	7.5
2,4-DINITROTOLUENE	ND	0.13
HEXACHLOROBUTADIENE	ND	0.5
HEXACHLOROBENZENE	ND	0.13
HEXACHLOROETHANE	ND	3.0
NITROBENZENE	ND	2.0
PENTACHLOROPHENOL	ND	100.0
PYRIDINE	ND	5.0
2,4,5-TRICHLOROPHENOL	ND	400.0
2,4,6-TRICHLOROPHENOL	ND	2.0

Notes and Definitions

ND = Not detected at detection limit 0.02

Analyst DSP Extracted 06/16/95

Units PPM Analyzed 06/21/95

Comments:

PARAMETER	QA/QC RESULTS	DUPPLICATE	SPIKE % RECOVERY
O-CRESOL	63	65	65
1,4-DICHLOROBENZENE	28	52	52

Results obtained from a sample in the same batch.

SURROGATES

BASE/NEUTRAL EXTRACTABLES

ACID EXTRACTABLES

SURROGATE	%RECOVERY	SURROGATE	%RECOVERY
2-FLUOROBIPHENYL	64	PHENOL-D6	47
NITROBENZENE-05	61	2-FLUOROPHENOL	52
TERPHENYL-014	83	2,4,6-TRIBROMOPHENOL	87

All QA/QC results shown are within EPA guidelines unless otherwise noted.

Approved by:

George A. Dust
Vice President

Dated: 06/27/95

RECEIVED
WMD RCRA
RECORD CENTER

MAR 14 1994

NOTIFICATION FILE

NOTIFICATION OF TREATMENT FOR CHARACTERISTIC HAZARDOUS WASTE
SUBMITTED IN ACCORDANCE WITH 40 CFR 268.7

RECEIVED

MAR 11 1994

GEORGE HAMPER
CHIEF, ILLINOIS SECTION
EPA Region V
77 WEST JACKSON BLVD., MAIL CODE HRP 8J
CHICAGO, ILLINOIS 60604

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

This notification of treatment of characteristic hazardous waste is submitted in accordance with the notification requirements of 40 CFR 268.7 (FR 55, No. 106, P. 22531, June 1, 1990).

Generator: ETHYL PETROLEUM ADDITIVES, INC.
Address: ETHYL PETROLEUM ADDITIVES, INC.
501 MONSANTO AVENUE
SAUGET ILLINOIS 62201

Facility contact: DONNA PARKS

Phone: 618-583-1388 1323

EPA I.D. Number: ILD 055871370

The above named facility has contracted with Perma-Fix Sludge Treatment Systems, Inc. to provide on-site treatment of characteristic hazardous wastes in accordance with the provisions of 40 CFR 262.34, 268.7 and 268.9. This waste is not a listed waste and will be treated within the generator's 90 day accumulation period.

Waste stream name: BARIUM PRESS CAKE

Process generating waste: FILTRATION OF PRODUCT

CONTAINER TYPE: 55 GALLON DRUM

() One-time estimated volume:
(X) On-going generation: 60-80 YRDS. PER YEAR

Characteristic waste code(s): D005

Treatment use: () Neutralization
() Cyanide destruction
(X) Stabilization
(X) Solidification
() Other

Fold at line over top of envelope to the
right of the return address

CERTIFIED

P 244 604 048

MAIL

RETURN RECEIPT
REQUESTED

CDP R

Page -2-

Subtitle D facility that will receive the waste:

LIDLAW WASTE SYSTEMS BRIDGETON FACILITY
13570 ST LOUIS ROAD
BRIDGETON MISSOURI 63044

This waste will be treated and sampled in accordance with the attached sample analysis plan.

Authorized generator signature:

Donna K. Parks

Printed name and title:

DONNA PARKS ENVIRONMENTAL ENG.

Date: 3/7/94

Attachments:

1. Waste analysis plan
2. Laboratory analysis of untreated waste
3. Analysis of treated waste (Perma-Fix conducted pilot study)

Contractor technical contact:

Stephen F. Smith
Operations Manager
Perma-Fix, Inc.
2272 Lackfee Road
Maryland Heights, MO. 63146

Telephone. (314) 997-5899

WASTE ANALYSIS PLAN FOR TREATED CHARACTERISTIC
HAZARDOUS WASTE SUBMITTED IN ACCORDANCE WITH
40 CFR 267.8 (FR 55 NO. 106, P. 22670, JUNE 1, 1990)

WASTE NAME: BARIUM PRESS CAKE

Generator: ETHYL PETROLEUM ADDITIVES INC.

Analysis on a representative sample of untreated waste:
TCLP ANALYSIS ON A REPRESENTATIVE SAMPLE IS ATTACHED. GENERATOR
CAN STATE BY KNOWLEDGE OF PROCESS THAT THE WASTE DOES NOT CONTAIN
VOLATILE OR SEMI-VOLATILE COMPOUNDS. ANALYSIS WILL BE REPEATED
ON A YEARLY BASIS.

Testing on untreated waste:

A RANDOM SAMPLE WILL BE TAKEN PER TEN DRUMS. EACH SAMPLE WILL
BE TESTED FOR BARIUM USING THE TCLP METHOD.

Analysis of treated waste:

<u>Waste Code on Untreated waste:</u>	<u>Treatment Limits</u>
<u>D005</u>	<u>LESS THAN 100.00</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

Certification: Random samples of treated waste will be tested before it is shipped to a subtitle D landfill.

I certify under penalty of law, that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Generator Contact: DONNA PARKS Phone: 618-538-~~1388~~ 1323

Contractor Technical Contact: Stephen F. Smith
Operations Manager
2272 Lackfee Road
Maryland Heights, Missouri
(314) 997-5899

GENERATORS KNOWLEDGE OF PROCESS

TO:

FROM: ETHYL PETROLEUM ADDITIVES, INC.

RE: GENERATORS KNOWLEDGE OF PROCESS CERTIFICATION OF THE ABSENCE
OF HERBICIDES, PESTICIDES, VOLATILES AND SEMI-VOLATILES.

BY KNOWLEDGE OF PROCESS, ETHYL PETROLEUM ADDITIVES, INC.
CERTIFIES THAT THERE IS NO PRESENCE OF HERBICIDES, PESTICIDES,
VOLATILES OR SEMI-VOLATILES LISTED IN 40 CFR PART 261.24 IN
THE BARIUM PRESS CAKE WASTE WHICH WE INTEND TO SHIP
TO LAIDLAW WASTE SYSTEMS FOR DISIPOSAL.

SIGNATURE

Donna K. Parks

TITLE ENVIRONMENTAL ENG.

NAME (PRINT OR TYPE) DONNA PARKS

DATE 3/7/94

COMPANY NAME ETHYL PETROLEUM ADDITIVES INC.

COMPANY ADDRESS 501 MONSANTO AVE.

SAUGET, ILLINOIS 62201

PHONE NUMBER (618) 583-~~1388~~ 1323

GENERATOR CERTIFICATION FORM

THIS CERTIFICATION FORM MUST BE COMPLETED BEFORE YOUR REQUEST TO DISPOSE OF NON-HAZARDOUS INDUSTRIAL WASTE CAN BE APPROVED.

"I CERTIFY THAT THE WASTE DESCRIBED IN THIS AND ATTACHED DOCUMENTS IS NOT A LISTED HAZARDOUS WASTE AS DESCRIBED BY 40 CFR 261 SUBPART D, AND THE WASTE IS NOT CONTAMINATED WITH A LISTED WASTE. I FURTHER CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS, AND THAT BASED UPON MY INQUIRY OF THESE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT."

GENERATOR'S NAME AND LOCATION ETHYL PETROLEUM ADDITIVES

501 MONSANTO AVE. SAUGET, ILLINOIS 62201

TYPE AND QUANTITY OF WASTE BARIUM PRESS CAKE

60-80 CUBIC YARDS PER YEAR

GENERATOR'S SIGNATURE Donna K Parks

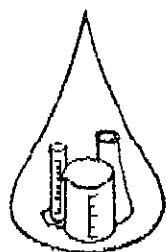
NAME AND OFFICIAL TITLE (TYPE OR PRINT) DONNA PARKS

ENVIRONMENTAL ENGINEER

DATE SIGNED 3/7/94

FOR FURTHER INFORMATION CONTACT:

PERMA-FIX ENVIRONMENTAL SERVICES, INC.
2272 LACKFEE ROAD
MARYLAND HEIGHTS, 63146
(314)997-5899



BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876

SAND SPRINGS, OKLAHOMA 74063

Ph: (918) 245-0281

Client: Perma Fix
Sample I.D.: St. Louis 012 Ethyl Petr Raw Barium Filter Cake
Bates Lab I.D.: 940085
Date Received: 2-03-94
Date Reported: 2-08-94

<u>Parameter</u>	<u>Result</u>	<u>Date and Time</u>	<u>Analyt</u>
TCLP Ag	<0.05 mg/l	1-19-94 1355	MM
TCLP As	<0.1 mg/l	1-19-94 1100	MM
TCLP Ba	133.0 mg/l	2-08-94 1000	MM
TCLP Cd	0.44 mg/l	1-19-94 1330	MM
TCLP Cr	<0.05 mg/l	1-18-94 1410	MM
TCLP Hg	0.0027 mg/l	1-18-94 1245	ZA
TCLP Pb	<0.1 mg/l	1-19-94 1345	MM
TCLP Se	<0.1 mg/l	1-21-94 1300	MM

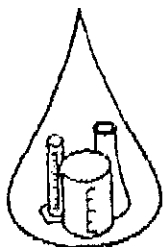
Methods are in Compliance with 40 CFR, Part 136 or SW 846

<u>Parameter</u>	<u>Method Number</u>
Ag	272.1
As	206.2
Ba	208.2
Cd	213.1
Cr	218.1
Hg	245.1
Pb	239.1
Se	270.2

Quality Control/Quality Assurance

<u>Sample No.</u>	<u>Item</u>	<u>Result</u>	<u>Dupl.</u>	<u>%Diff</u>	<u>%Spike Recovery</u>
940065	Ag	<0.05	<0.05	0.0%	87.0%
940085	As	<0.1	<0.1	0.0%	81.48%
940190	Ba	<0.1	<0.1	0.0%	86.0%
940085	Cd	0.42	0.45	6.67%	94.77%
940085	Cr	<0.05	<0.05	0.0%	80.0%
940085	Pb	<0.1	<0.1	0.0%	100.0%
940085	Se	<0.1	<0.1	0.0%	92.8%

Marcia H. Bates, Ph. D. PE

**BATES LAB**

207 LAKE DRIVE SOUTH * PO BOX 876

SAND SPRINGS, OKLAHOMA 74063

Ph: (918) 245-0281

Client:Sample I.D.:Bates Lab I.D.:Date Received:Date Reported:

Perma Fix

St Louis 012 Ethyl Petr Stab Filter Cake

940288

2-14-94

2-16-94

Parameter

TCLP Ba

Result

0.42 mg/l

Date and Time

2-16-94 1130

Analyst

MM

Methods are in Compliance with 40 CFR, Part 136 or SW 846

Parameter

Ba

Method Number

208.2

Quality Control/Quality Assurance

Sample No.

940288

Item

Ba

Result

0.41

Dupl.

0.42

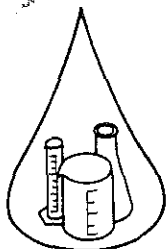
%Diff

2.38%

%Spike Recovery

85.0%


Marcia H. Bates, Ph. D. PE



BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876
SAND SPRINGS, OKLAHOMA 74063
Ph: (918) 245-0281

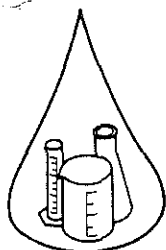
Client: Perma Fix
Sample I.D.: St. Louis 012 Ethyl Petr. Stab Ba Press Cake
Bates Lab I.D.: 932552
Date Received: 12-30-93
Date Reported: 1-14-94

<u>Parameter</u>	<u>Result</u>	<u>Date and Time</u>	<u>Analyst</u>
TCLP Ag	<0.05 mg/l	1-05-94 1410	MM
TCLP As	<0.1 mg/l	1-10-94 1100	MM
TCLP Ba	0.29 mg/l	1-05-94 1500	MM
TCLP Cd	<0.05 mg/l	1-05-94 1345	MM
TCLP Cr	<0.05 mg/l	1-05-94 1255	MM
TCLP Hg	<0.0002 mg/l	1-04-94 0930	ZA
TCLP Pb	0.17 mg/l	1-05-94 1045	MM
TCLP Se	<0.1 mg/l	1-12-94 1130	MM
Sulfide Reactivity	<0.012 mg/kg	1-10-94 1700	ZA
Cyanide Reactivity	<0.5 mg/kg	1-04-94 1500	MM
Corrosivity	7.2 SU	1-12-94 1410	MM
Ignitability	>220°F	1-10-94 1000	MM

Methods are in Compliance with 40 CFR, Part 136 or SW 846

<u>Parameter</u>	<u>Method Number</u>
Ag	272.1
As	206.2
Ba	208.2
Cd	213.1
Cr	218.1
Hg	245.1
Pb	239.1
Se	270.2
Sulfide	9030, 376.2
CN	9010, 335.2
Ignitability	1010
Corrosivity	9045

Marcia H. Bates, Ph. D. PE



BATES LAB

207 LAKE DRIVE SOUTH * PO BOX 876
SAND SPRINGS, OKLAHOMA 74063
Ph: (918) 245-0281

Client: Perma Fix Page 2
Sample I.D.: St. Louis 012 Ethyl Petr. Stab Ba Press Cake
Bates Lab I.D.: 932552
Date Received: 12-30-93
Date Reported: 1-14-94

Quality Control/Quality Assurance

<u>Sample No.</u>	<u>Item</u>	<u>Result</u>	<u>Dupl.</u>	<u>%Diff</u>	<u>%Spike Recovery</u>
932552	Ag	<0.05	<0.05	0.0%	89.0%
932552	As	<0.1	<0.1	0.0%	115.0%
932552	Ba	0.28	0.29	3.45%	101.3%
932552	Cd	<0.05	<0.05	0.0%	87.0%
932552	Cr	<0.05	<0.05	0.0%	90.0%
932515	Hg	<0.0002	<0.0002	0.0%	-----
932544	Hg	-----	-----	-----	112.0%
932552	Pb	0.17	0.17	0.0%	85.47%
932552	Se	<0.1	<0.1	0.0%	84.8%
932553	Sulfide	<0.011	<0.011	0.0%	-----
	Reactivity				
932544	Cyanide	<0.0002	<0.0002	0.0%	-----
	Reactivity				
932552	Corrosivity	7.1	7.2	0.0%	-----
932552	Ignitability	>220°F	>220°F		

Marcia H. Bates

Marcia H. Bates, Ph. D. PE

eln Compliance

F.O.S.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Ethyl Petroleum Additives, Inc.
 U.S. EPA I.D. No.: ILD 055871370 LPC 1631210013
 Street: Monsanto Ave.
 City: Sauget State: IL Zip Code: 62701
 Telephone: 618/274-4000
 Operator: Same as above
 Street: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____
 Owner: Ethyl Corporation
 Street: 451 Florida
 City: Baton Rouge State: LA Zip Code: 70801
 Telephone: _____
 Inspection Date: 6/21/88 Time: 10:00am 12:05pm Weather Conditions: 95° dry

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Wendy Schaufelberger</u>	<u>IEPA</u>	<u>618/345-4606</u>
	<u>Randy Ballard</u>	<u>IEPA</u>	<u>618/345-4606</u>
Facility Representatives:	<u>Mike Bonaventure Env. Supervisor</u>		
	<u>Christa Andrew Chemical Engineer</u>		

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u>X</u>	<u>X</u>	_____
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	_____	_____	_____
Disposer	_____	_____	_____

OFFICE OF RCRA
 Waste Management Division
 U.S. EPA, REGION 1

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 IEPA-DLPC

1631210013 - St. Clair County
Sauget/Ethyl Petroleum Additives
ILD055871370

REMARKS

Ethyl Petroleum Additives, Inc. utilizes various processes to produce different grades of additives for petroleum products such as motor oil and transmission fluid. The processes at Ethyl are operated intermittently depending upon the demand for products by clients. This results in variable generation rates of hazardous wastes.

The following waste streams, Naptha drains, spent kerosene, waste pinene, and waste dicyclopentadiene are all hazardous for ignitability. This determination was made through knowledge of the wastes and the processes in which they are utilized. The Naptha is reclaimed by Safety Kleen and the kerosene, pinene and dicyclopentadiene are shipped to LWD in Calvert City, KY for disposal. An off-spec petroleum additive is infrequently generated. The product becomes off-spec when a malfunction in a sensitive process occurs. The process consists of reacting lime with alkyl benzene sulfuric acid and the addition of solvents to maintain viscosity. Results of analysis dated 2/8/88 characterized the waste as being hazardous for ignitability (D001). It is shipped to Solvent Resource Recovery in West Carrollton, OH for reclamation.

Spent acid sludge (D002) was a one time generation, and was disposed of at LWD. The filter cake (D005) consists of diatomaceous earth and is used in a process to filter out barium. It is shipped to PDC in Peoria for disposal. The lab wastes (F003) are generated by cleaning lab equipment. A satellite accumulation area near the lab is used for collection of this waste. It is disposed of at LWD. Methanol (U154) and benzene (U019) are both generated as process wastes at variable rates. They are also disposed of at LWD.

The hazardous wastes are stored on site in drums for less than 90 days. The drum storage area consists of a curbed concrete pad with a drain and closed sump. The area lies under a canopy. (See photo #2) The satellite accumulation area consists of a curbed concrete pad and the drums are set on a pallet. (See photo #1) Four drums can be seen in photo #1, but only one is currently being filled. The other three drums are empty.

A review of the paperwork and a tour of the facility revealed no apparent violations during this inspection.

WGS:jlr/21

**RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	<u>X</u> _____	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

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2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
- ☐ Pharmaceutical wastewater containing spent methylene chloride
- ☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

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B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: Lab solvents
Lab waste, listed waste

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: EOA3 Lab waste Solvents

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

NA

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☒ NA

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LEPA-DLPC

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

- ____ Liquid hazardous waste having a pH less than or equal to 2
- ____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- ____ Liquid hazardous waste containing metals
- ____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, note how this is adequate: _____

- Testing

____ Yes ____ No ____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes ____ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No *however, it is stored for less than 90 days*

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Identify off-site treatment or storage facilities: LWD, Calvert

City, Ky 9211570001

N/A X Knowledge of waste

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

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If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☒ No ☒ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:



Environmental Protection Agency

113 W. Main Street Collinsville, IL. 62234

618/345-4606

Refer to: St. Clair County - ILD055871370 - Sauget/Edwin Cooper, Inc.

January 20, 1982

Edwin Cooper, Inc.
Monsanto Avenue
Sauget, Illinois 62201

ATTN: James Sparks

Dear Mr. Sparks:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on November 30, 1981. The inspection was conducted under the authorization of the United States Environmental Protection Agency (USEPA). A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended. We are pleased to report that your facility was found to be in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact Diane H. Spencer at the above number.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth G. Mensing". The signature is written in a cursive, flowing style.

Kenneth G. Mensing, Southern Region Manager
Land Field Operations Section
Division of Land/Noise Pollution Control

DMS:jlr

Enclosure: Inspection Report

cc: Division File
Southern Region
Region V: USEPA ✓

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JAN 22 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

STATE IDENTIFICATION NUMBER
(If Applicable)

1LD055871370
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: EDWIN COOPER, INC.
(B) Street: MONSANTO AVENUE
(C) City: SAUGET (D) State: ILLINOIS (E) Zip Code: 62201
(F) Phone: 618/274-4000 (G) County: ST. CLAIR
(H) Date of Inspection: 11-30-81 Time of Inspection (From) 9:00 a. (To) 12:10 p.
(I) Weather Conditions: RAINING, WINDY, ≈ 35°

(J) Person(s) interviewed	Title	Telephone
<u>JIM SPARKS</u>	<u>ENVIR. TECHNICIAN</u>	<u>618/274-4000</u>
<u>RICH RUTHERFORD</u>	<u>SAFETY DIRECTOR</u>	<u>618/274-4000</u>
<u>SAM McWILLIAMS</u>	<u>PLANT MANAGER</u>	<u>618/274-4000</u>

(K) Inspection Participants	Agency/Title	Telephone
<u>JIM SPARKS</u>	<u>EDWIN COOPER / ENV. TECH.</u>	<u>618/274-4000</u>
<u>DIANE SPENCER</u>	<u>I.E.P.A. / EPS</u>	<u>618/345-4606</u>

(L) Preparer Information

Name	Agency/Title	Telephone
<u>DIANE M. SPENCER</u>	<u>I.E.P.A. / ENV. PROT. SPECIALIST</u>	<u>618/345-4606</u>

Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

EDWIN COOPER, INC. IS A DIVISION OF ETHYL CORPORATION. SEVERAL WASTES GENERATED AT THE SITE ARE HAZARDOUS DUE TO IGNITABILITY (D001). HAZARDOUS WASTES ARE NOT PRODUCED ON A REGULAR BASIS. RATHER, CERTAIN WASTES ARE GENERATED ONLY WHEN CERTAIN PRODUCTS ARE BEING PRODUCED. AT THE TIME OF THE INSPECTION, NO HAZARDOUS WASTE WAS PRESENT.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>WASTES SHIPPED TO ARKANSAS FOR INCINERATION</u>
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Name and EPA ID Number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures?	✓			
(C) Does the owner or operator submit exception reports when needed?				N/A AT THIS TIME

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)			✓	NO WASTE BEING PACKAGED FOR SHIPMENT AT THIS TIME
Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)			✓	
(C) If required, are placards available to transporter?			✓	
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?			✓	NO WASTE ON SITE
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?			✓	NO WASTE ON SITE

*Not Inspected

Yes No NI* Remarks

3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?

N/A
(AT THIS TIME)

WEEKLY INSPECTIONS OF DRUM AND STORAGE AREA ARE CONDUCTED.

STORAGE AREA IS LOCATED \approx 50' FROM PROPERTY LINE, BUT NO WASTE WAS PRESENT AT THE TIME OF THE INSPECTION.

4. If wastes are stored in tanks, are the tanks managed according to the following requirements:

a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?

N/A

b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?

N/A

c. Do continuous feed systems have a waste-feed cutoff?

N/A

d. Are required daily and weekly inspections done?

N/A

e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)

N/A

f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)

N/A

g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

N/A

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: _____				
1. Job Titles?	✓			
2. Job Descriptions?	✓			
3. Description of training?	✓			FORMAL OUTSIDE TRAINING
4. Records of training?	✓			
5. Have facility personnel received required training by 5-19-81?	✓			
6. Do new personnel receive required training within six months?			N/A	
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility: _____				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		

2. If required, does this facility have the following equipment?

- a. Internal communications or alarm systems?
- b. Telephone or 2-way Radios at the scene of operations?
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓

✓

✓

Indicate the volume of water and/or foam available for fire control

450,000 GAL. WATER ; POSSIBLE USE OF CITY OF
E. ST. LOUIS WATER SUPPLY

3. Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓

MONTHLY CHECKS

- b. Is emergency equipment maintained in operable condition?

✓

- 4. Has owner/operator provided immediate access to internal alarms (if needed)?

✓

- 5. Is there adequate aisle space for unobstructed movement?

N/A

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)



b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?



VERBAL, WORKING AGREEMENTS WITH LOCAL DEPTS.

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.



d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?



e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.



2. Are copies of the Contingency Plan available at site and local emergency organizations?

_____ ✓ _____

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

_____ ✓ _____

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

_____ ✓ _____

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

_____ ✓ _____

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

_____ N/A IN THE CASE OF HAZ. WASTE _____

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

_____ ✓ _____

(B) Has the generator submitted Annual Reports and Exception Reports as required?

_____ N/A AT THIS TIME _____

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

_____ ✓ _____

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing? N/A

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country? N/A

c. Met the Manifest requirements? N/A

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements? N/A

VIII. Remarks

MARKS: AT THE TIME OF THE INSPECTION, NO HAZARDOUS WASTES WERE
BEING GENERATED. HAZARDOUS WASTE IS GENERATED AT THE FACILITY WHEN
CERTAIN PRODUCTS ARE PRODUCED. DUE TO THIS RANDOM GENERATION,
ONLY TWO (2) SHIPMENTS OF WASTE HAVE LEFT THE SITE (JULY 23 AND
AUGUST 5). PROPER DATING AND LABELING OF THE CONTAINERS COULD NOT
BE CHECKED DUE TO THE LACK OF WASTE. NO TANK STORAGE IS UTILIZED.
THE SAFETY DIR. AND ENVIR. TECH. HAVE RECEIVED FORMAL CLASSROOM
INSTRUCTION IN THE MANAGEMENT OF HAZ. WASTE OUTSIDE THE FACILITY. NO
OTHER PERSONNEL HANDLE THE HAZ. WASTE. PAPERWORK REGARDING
MANIFESTS, CONTINGENCY PLAN, SAFETY, AND TRAINING WERE REVIEWED
AND APPEARED TO MEET THE REQUIREMENTS OF 40 CFR 262.